

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



January 25, 2016

Jimmie Cho, Senior Vice President
Gas Operations and System Integrity
Southern California Gas Company
555 West 5th Street, GT21C3
Los Angeles, CA 90013

GI-2015-04-SCG-58-02A

Subject: General Order (G.O.) 112¹ Operation and Maintenance Inspection of Southern California Gas Company's Cathodic Protection Facilities in the San Gabriel Valley Distribution Area

Dear Mr. Cho:

The Safety and Enforcement Division (SED) of the California Public Utilities Commission conducted a G.O. 112¹ Operation and Maintenance Inspection of Southern California Gas Company's (SCG) Cathodic Protection (CP) Facilities in the San Gabriel Valley Distribution Area (Inspection Unit) on April 20-24, 2015. The inspection included a review of the Inspection Unit's cathodic protection and odorant records for calendar years 2013 and 2014 and random field inspections of pipeline facilities in the Alhambra, Industry, Pasadena, and Azusa districts. SED staff also reviewed the Inspection Unit's Operator Qualification records, which included field observation of randomly selected individuals performing covered tasks.

SED staff identified one probable violation of G.O. 112¹, Reference Title 49 Code of Federal Regulations (CFR), Part 192 during the course of this inspection. It is described in the "Summary of Inspection Findings", which is enclosed with this letter.

Please provide a written response within 30 days of receipt of this letter indicating any updates or corrective actions taken by SCG. Pursuant to Commission Resolution ALJ-274, SED staff has the authority to issue citations for each violation discussed during the inspection. SED will notify SCG of the enforcement action it plans to take after it reviews SCG's inspection response.

If you have any questions, please contact Michelle Wei, at (213) 620-2780.

Sincerely,

Kenneth Bruno
Program Manager
Gas Safety and Reliability Branch
Safety and Enforcement Division

A handwritten signature in blue ink that reads "Kenneth A. Bruno".

CC: Michelle Wei, SED/GSRB
Jeff Koskie, Sempra
Kan Wai Tong, SED/GSRB

¹ General Order 112-F was adopted by the Commission on June 25, 2015 via 15-06-044

Summary of Inspection Findings
2014 SCG San Gabriel Valley Distribution Inspection
April 20-24, 2015

SED Identified Probable Violation

Title 49 CFR Part 192, Section 192.465(a) – External Corrosion Control: Monitoring

“Each pipeline that is under cathodic protection must be tested at least once each calendar year, but with intervals not exceeding 15 months... However, if tests at those intervals are impractical for separately protected short sections of mains or transmission lines, not in excess of 100 feet (30 meters), or separately protected service lines, these pipelines may be surveyed on a sampling basis. At least 10 percent of these protected structures, distributed over the entire system must be surveyed each calendar year, with a different 10 percent checked each subsequent year, so that the entire system is tested in each 10-year period.”

SED discovered that the Inspection Unit did not inspect four separately protected service lines in the Azusa district every 10 years as required by 192.465(a). See table for further information.

Service ID	Address	City	Date isolated or last inspected	Date inspected	Cycles missed
1018684	2243 Garey	Pomona	1977	7/31/2014	3
1454863	1325 Huntington	Duarte	1989	2/2/2014	2
2072080	642 Baseline	San Dimas	1973	11/25/2013	3
2072139	1076 Kiowa	San Dimas	3/12/2004	3/4/2015	1

SED identified these during record review. SCG added the first three to the CP10 inspection items for 2013 and 2014 after they ran a report designed to find unidentified CP10s. SCG inspected them shortly after discovery. The final inspection was missed due to an employee mis-identifying a riser as plastic on July 10, 2014, which would have been within the inspection window. SCG re-inspected it on March 4, 2015 and it read within tolerance. However, since SCG did not inspect these assets within the required time frame, SED found SCG in violation of Title 49 CFR Part 192, Section 192.465(a).